

DMP:CRH/JMH/EMS  
F.#2017R00906

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

FILED EX PARTE,  
IN CAMERA AND UNDER SEAL

HU JI,  
LI MINJUN,  
TU LAN,  
ZHU FENG,  
also known as "Johnny Zhu,"  
KUANG ZEBIN,  
MICHAEL MCMAHON,  
Zhai YONGQIANG,  
ZHENG CONGYING, and  
ZHU YONG,  
also known as "Jason Zhu,"

21-CR-265 (PKC)

Defendants.

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GOVERNMENT'S MEMORANDUM IN SUPPORT OF ITS CLASSIFIED  
EX PARTE, IN CAMERA MOTION FOR A PROTECTIVE ORDER PURSUANT TO  
SECTION 4 OF THE CLASSIFIED INFORMATION PROCEDURES ACT AND  
RULE 16(d)(1) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

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